Umetco Minerals Corporation



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N/ 9 1988

May 15, 1986

Dr. F. J Bradley Principle Radiophysicist New York State Department of Labor Room 813 One Main Street Brooklyn, NY 11202

Subject Umetco Minerals Corporation, Niagara Falls, NY

Dear Dr Bradley

In our phone conversation of Tuesday, May 13 we discussed disposal of two low level radioactive materials that were discovered in a radiation survey of the Umetco property in Niagara Falls, NY. The first was illmenite sand (an iron titanium ore) that had been used to backfill a 10' x 10' concrete pit The second was an isolated quantity of slag (calcium-aluminum oxide) from the furnacing of ferrovanadium. The illmenite sand was removed from the pit and currently is contained in 125 (one hundred twenty-five) 55-gallon drums. I would estimate total weight at approximately 40 to 50 tons. The slag is in lumps in a pile that I would estimate to contain 50 to 75 tons. Analyses of the materials are presented in the following Table 1

TABLE 1

Radiochemical Analyses of Samples From the Niagara Plant

	Analyses					
	URANIUM SERIES			THORIUM SERIES		
<u>Description</u>	Uranium	Th-230	Ra-226	Th-232	Th-228	
	μg/g	pC1/g	pC1/g	pC1/q	pC1/g	
Illmenite Sand - Top of Pit	28 9	12±2	19±2	16±2	17±2	
Illmenite Sand - 7' in Pit	44 3	22±2	31±3	37±2	39±3	
Dark Slag-Yard East of Fce Bldg	20 2	299±7	4 4±1 1	16±2	4±9	
Light Slag-Yard East of Fce. Bldg	18 6	466±9	7 0±1 4	37±3	14±2	

Industrial Code Rule 38, Table 5 "Limits for Uncontrolled Areas" limits source material to 0 05 percent by weight (500 $\mu g/g$ or 500 ppm) For Thorium 232 this converts to 55 pCi/g. The concentrations of Th-232 reported in picocurries in Table 1 were converted to $\mu g/g$ and added to the weight of uranium to determine the total source material present. This is shown in Table 2

The gamma radiation measured at the surface during excavation of the pit and within the slag pile is also reported in Table 2

TABLE 2
Weight of Source Material

Sample	Uranium <u>ug/g</u>	Th-232 <u>ug/g</u>	Total Source Material 	Gamma Radiation μR/hr*
Illmenite-Top of Pile	28 9	145 5	174 4	170
Illmenite-7' In Pit	44 3	336 4	380 7	150
Dark Slag	20 2	145 5	165 7	150
Light Slag	18 6	336 4	355 0	200

*Ludlum Model 19 Micro R Meter - Reading at Surface

As we discussed the total source material in both materials is less than 500 $\mu g/g$, the limit for uncontrolled areas and the radiation is less than 250 μR , the limit for fixed surface contamination

Although technically the material was not sufficiently radioactive to be controlled you convinced me that it was not a good idea to use it to fill a low area in the yard. If this were done then a rider would have to be appended to the lease that would restrict future building. Since this is not an attractive option I propose to dispose of both the slag and illmenite in a local hazardous waste repository

Unless I misunderstood, you did not voice an objection to this during our phone conversation. Therefore, I plan to immediately begin the paper work to initiate this course of action. However I will not remove anything from the property before June to allow you time to reconsider. I will not expect to hear from you unless you disapprove

I enjoyed talking to you on Monday and I want to thank you again for the assistance you provided

Sincerely

D. J. Hanser

Assistant Director - Technology

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